

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION

ANN WILDER, PH.D.,  
Plaintiff,

v.

STEPHEN F. AUSTIN STATE  
UNIVERSITY,  
Defendant.

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Civil Action No. 9:20-CV-40

**DEFENDANT'S EXHIBIT LIST**

PRESIDING JUDGE ZACK HAWTHORN					PLAINTIFF'S ATTORNEY Tanner Franklin	DEFENDANT'S ATTORNEYS Amy Hilton Matthew Bohuslav
TRIAL DATE (S) August 16, 2021					COURT REPORTER	COURTROOM DEPUTY
PLF. NO	DEF. NO	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS	BATES NUMBER
	1				Policy 7.29: Tenure and Continued Employment (revised 2016)	D-002557-2565
	2				Policy 7.29: Tenure (revised 2011)	Wilder 001022-1015
	3				Third Year Pre-Tenure Review	Wilder 001907-1910
	4				Faculty Evaluation—First Year	Wilder 001140-1142
	5				Offer letter	Wilder 000769-771
	6				Complaints re: Dr. Wilder	D-000357-452
	7				Memo re: Harassment Investigation from Brian Murphy to Steven Bullard	Wilder 000168-187
	8				Jan. 23, 2018 Email from Dr. Wilder re: observation of SWK 500	D-001954
	9				Memo from Dr. Oliphant to Dr. Avant	D-000394

	10				Annual Faculty Evaluation Sept. 1, 2016-Dec. 31, 2017	D-000546-548
	11				Discrimination Complaints for Dr. Wilder	Wilder 000583-650
	12				Memo from Dr. Oliphant to Dr. Avant re: concern related to pre-tenure review	D-000394
	13				Dec. 2, 2016 Letter from student to Dr. Oliphant	D-000399-400
	14				Faculty Code of Conduct (revised January 29, 2019)	Wilder 002510-2512
	15				Email from Dr. Wilder to Dr. Avant re: 18-19 contract	D-001222-224
	16				Carlow University Agreement	Wilder 000456
	17				Letter from Dr. Bullard to Dr. Wilder re: appeal	Wilder 000076
	18				Letter from Dr. Murphy to Dr. Wilder re: non-reappointment	Wilder 000900
	19				Letter from Dr. Patillo to Drs. Murphy and Wilder with enclosure	D-000276-278
	20				Emails between Drs. Avant and Wilder re: Fall Reassignment	D-001163-65
	21				Faculty Contract 2018-2019	D-000139
	22				Report of Findings and Recommendations from Dr. Bisping to Dr. Bullard	D-000346-356

	23				Letter from Dr. Bullard to Dr. Wilder re: Age and Gender Discrimination Complaint	D-000292
	24				Discrimination Review Board Written Recommendation	D-003193
	25				Emails re: David Justus	D-003672-3675
	26				Report of Findings and Recommendations from Dr. Murphy to Dr. Bullard re: Dr. Cooper's salary dispute	D-003678-3683
	27				Email between Dr. Avant, Marc Guidry, and Dr. Bullard re: salary	D-006970-6975
	28				Social Work budget spreadsheets	D-000798-800
	29				Policy 12.6 Faculty Compensation	D-007022-7025
	30				Faculty Compensation (E-71) (last revised April 17, 2012)	D-007018-7020
	31				Dr. Carbajal's Resume	D-002774-778
	32				Dr. Wilder's Resume	D-002822-2827
	33				Annual Faculty Evaluation AY 2014-15	Wilder 000035-38
	34				Memo from Dr. Murphy to Dr. Bullard re: Third-Year Review	D-000552
	35				Notice of Non-Reappointment	D-000138
	36				Emails re: picking up 18-19 contract	D-000140-142
	37				Emails re: declining 18-19 contract	D-000143-144

	38				Letter from President Westbrook to Dr. Wilder re: Discrimination Review Board findings	D-000323
	39				Dr. Oliphant Memo to Self	D-000325-326
	40				Discrimination Review Board Written Recommendation re: Age and Gender Discrimination Complaint	D-000453
	41				Carbajal Faculty Evaluation 15-16	D-000623
	42				Carbajal Faculty Evaluation 2018	D-000624-627
	43				Letter from Dr. Bullard to Dr. Wilder re: result of investigation	D-000785
	44				Memo from Dr. Oliphant to Dr. Bisping re: discrimination complaint	D-002541
	45				Tenure (E-50A) (last revised 2011)	D-002566-2573
	46				Policy 2.11 Discrimination Complaints/Sexual Harassment (last revised 2015)	D-002574-2582
	47				Policy 2.11 Discrimination Complaints (last revised Jan. 2016)	D-002583-589
	48				Policy 2.11 Discrimination Complaints (last revised July 2015)	D-002599-2605
	49				Committee Summary Pre-Tenure Form: Departmental Level	Wilder 001403-04
	50				Course Evaluation Report	Wilder 001748-1788
	51				Communications to Dr. Oliphant re: Dr. Wilder	Wilder 000019-34

	52				Dr. Oliphant's notes re: student complaint	Wilder 000082
	53				Emails to Dr. Oliphant re: concerns	Wilder 000022-24
	54				Email to Dr. Avant re: student concern	Wilder 001072
	55				Letter from Kristin Wallace	Wilder 001210
	56				Emails to Dr. Oliphant re: concerning issues in SWK 58	Wilder 001217
	57				Email to Dr. Oliphant re: Concerns	Wilder 001221
	58				Email from K. Belanger to Dr. Oliphant re: concern	Wilder 001229
	59				Email from W. De La Cruz to Dr. Oliphant re: 9/16/15	Wilder 001231
	60				Faculty Contract AY 15-16	Wilder 000772
	61				Faculty Contract AY 16-17	Wilder 000773
	62				Faculty Contract AY 17-18	Wilder 000889
	63				SFA Org Chart	Wilder 002060
	64				Memo from Dr. Bullard to Dr. Berry re: Kronrad Investigation	D-004038-4041
	65				Plaintiff's Objections and Responses to Defendant's Second Set of Interrogatories	

Dated: July 12, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on July 12, 2021 the foregoing document was filed via the Court's CM/ECF system, causing electronic service upon all counsel of record.

/s/ Amy S. Hilton

**AMY S. HILTON**  
Assistant Attorney General